

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

PARTIAL RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS JOHN P. KELLEY (USPS-T-15) TO INTERROGATORIES OF
UNITED PARCEL SERVICE (UPS/USPS-T15-8-9) (August 4, 2006)

The United States Postal Service hereby provides the partial responses of
witness John P. Kelley (USPS-T-15) to the following interrogatories of United Parcel
Service, filed on July 27, 2006:

UPS/USPS-T-15-8-9

Partial objections are being filed today to both of these interrogatories. Each
interrogatory is stated verbatim and is followed by the partial response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
KELLEY (USPS-T-15) TO INTERROGATORY OF UNITED PARCEL SERVICE

UPS/USPS-T15-8. Refer to USPS-LR-L-35, Table 100. Provide volume data by mail class. The submission of responses under the protective conditions outlined in Presiding Officer's Ruling No. R2006-1/5 is acceptable.

RESPONSE:

Partial objections filed.

The volume data that I received when I put Table 100 of USPS-LR-L-35, entitled Raw Data, together -- total cubic feet for which the Postal Service was invoiced by FedEx for the Day turn on each day of the Base Year -- were not broken down by mail class. It was not necessary to break the data down by mail class under the methodology I employed. It is my understanding that these raw invoice data are not broken down by mail class.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
KELLEY (USPS-T-15) TO INTERROGATORY OF UNITED PARCEL SERVICE

UPS/USPS-T15-9. Refer to USPS-LR-L-35, Table 100. Provide similar analyses or data for years FY2001 through FY2004, including volume data by mail class. The submission of responses under the protective conditions outlined in Presiding Officer's Ruling No. R2006-1/5 is acceptable.

RESPONSE:

Partial objections filed.

The volume data that I received when I put Table 100 of USPS-LR-L-35, entitled Raw Data, together -- total cubic feet for which the Postal Service was invoiced by FedEx for the Day turn on each day of the Base Year -- were not broken down by mail class. It was not necessary to break them down by mail class under the methodology I employed. It is my understanding that these raw invoice data are not broken down by mail class.

I also did not receive data from any year preceding the Base Year (FY 2005), as it was not necessary to perform a similar analysis for earlier years, or review the data from earlier years.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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